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27. (New) The apparatus of claim 9, wherein the persistent in-memory database table remains in memory until a user specifies removal of said persistent in-memory database table.

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28. (New) The apparatus of claim 9, wherein the data remains in the persistent in-memory database table after it is accessed by a first user and is available for access by a second user.

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29. (New) The article of manufacture of claim 17, wherein the persistent in-memory database table remains in memory until a user specifies removal of said persistent in-memory database table.

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30. (New) The article of manufacture of claim 17, wherein the data remains in the persistent in-memory database table after it is accessed by a first user and is available for access by a second user.

REMARKS

Claims 1-24 were pending on the date the Office Action to which this Amendment responds was mailed. New claims 25-30 are added by this Amendment. Therefore, claims 1-30 are all the claims pending in the present application.

Claims 1, 9 and 17 are rejected under 35 USC §102(e) as being anticipated by Pereira. Applicant respectfully traverses the rejection at least because Pereira does not disclose each and

every limitation recited in the claims. Pereira does not disclose or even suggest, for example, a persistent in-memory database table, as required by those claims.

Claims 1, 9 and 17, are directed to methods, apparatuses, and articles of manufacture, respectively, for storing data in the memory of a computer. These claims recite creating a persistent in-memory database table and loading data into the in-memory database table. It is respectfully submitted that Pereira does not disclose, or even suggest, a persistent in-memory database table, as asserted in the Office Action.

Pereira describes an approach for reorganizing a source database table by using a mapping table to coordinate the transfer of blocks of data from the source database table to a reorganized database table. In the Office Action, it is asserted that Pereira discloses a persistent in-memory database table and several portions of Pereira are relied to support that assertion. However, it is respectfully submitted that Pereira does not disclose the claimed persistent in-memory database table including any of the portions of that reference cited in the Office Action.

In the Office Action, col. 2, lines 53-56 is cited in support of Pereira disclosing an in-memory database table. That portion of Pereira relates to a database administrator deciding the percentage of blocks to remain free during the reorganization. That portion of Pereira, however, does not disclose or even suggest that such blocks hold a persistent in-memory database table, as required by the claims. Rather, the blocks, presumably of memory, even if they hold a portion of a database table, do not persistently hold the database table since the blocks of memory are used only in a reorganization process.

Pereira, at col. 12, lines 9-10, also relied on in support of the rejection, defines persistent storage as disk based storage (i.e., magnetic disk storage media). That disclosure merely indicates that “dirty” blocks, presumably of memory, are written to a persistent storage medium other than memory, such as disk memory. Pereira refers to the disk as being persistent storage, not the memory. Nowhere in the portions of the reference relied on in the Office Action to support the rejection, or anywhere else in the Pereira, is a persistent in-memory database table disclosed, as required by the claims.

Finally, Pereira, at col. 9, lines 62-66, is relied on for disclosing that mapping information used in the reorganization process, “can be stored in the form of a table in the DBMS, in memory, on a file system, or any other method in which the mapping table may be maintained and later used by the reorganization process.” That portion of Pereira, however, does not disclose a persistent in-memory database table, as required by the claims, but rather merely discloses that mapping information, that relates to a database can be stored in memory. It does not disclose that the mapping information is a database table or that the memory persistently stores that mapping information. In fact, it is respectfully submitted that a person of ordinary skill in the art would understand that the mapping information at most is loaded only temporarily into memory since that information is needed only for the reorganization process.

Pereira describes creating a mapping information data store each time the reorganization process is executed followed by a cleanup process. See Fig 1B, blocks 135 and 160. Pereira also discloses that at the end of the reorganization process that user sessions with a source table are killed and the source table is dropped. See Fig. 11, step 1110 and col. 12, lines 40-50. Accordingly, it is

respectfully submitted that a person of ordinary skill in the art would understand that the mapping information data store, as well as other tables used in the database table reorganization, are only temporary held in memory and not persistently held in memory.

Independent claims 9 and 17 also recite a persistent in-memory database table. Since Pereira does not disclose, or even suggest, a persistent in-memory database table, as required by the claims, it is respectfully submitted that Pereira does not anticipate independent claims 1, 9 and 17.

The remaining claims contain by reference all the limitations of one of claims 1, 9 and 17, and hence, are not anticipated for at least the same reasons.

Claims 2-3, 10-11 and 18-19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Pereira in view of Sarkar. Applicant respectfully traverses the rejection at least because the asserted combination does not include all the limitations recited in the claims.

Sarkar is relied on for disclosing a relational data store and for disclosing a user defined routine. However, it is respectfully submitted that Sarkar does not satisfy the deficiencies of Pereira, and those references, either alone or in combination, do not teach or suggest all the limitations of the claims. Accordingly, even assuming *arguendo* that it would have been obvious to combine the teachings of Pereira with Sarkar, as asserted in the Office Action, such a combination would not satisfy all the limitations of the claims, and hence, does not render the claims unpatentable.

Claims 4, 8, 12, 16, 20 and 24 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Pereira in view of Shaunghnessy. Applicant respectfully traverses the rejection at least because the asserted combination does not include all the limitations recited in the claims. Shaunghnessy is relied on for disclosing shared access and for disclosing limiting access. However, it is respectfully

submitted that Shaunghnessy does not satisfy the deficiencies of Pereira, and those references, either alone or in combination, do not teach or suggest all the limitations of the claims. Accordingly, even assuming *arguendo* that it would have been obvious to combine the teachings of Pereira with Shaunghnessy, as asserted in the Office Action, such a combination would not satisfy all the limitations of the claims, and hence, does not render the claims unpatentable.

Claims 5, 13 and 21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Pereira in view of Blakeley. Applicant respectfully traverses the rejection at least because the asserted combination does not include all the limitations recited in the claims. Blakeley is relied on for disclosing dropping a database table upon receipt of a drop table command. However, it is respectfully submitted that Blakeley does not satisfy the deficiencies of Pereira, and those references, either alone or in combination, do not teach or suggest all the limitations of the claims. Accordingly, even assuming *arguendo* that it would have been obvious to combine the teachings of Pereira with Blakeley, as asserted in the Office Action, such a combination would not satisfy all the limitations of the claims, and hence, does not render the claims unpatentable.

Claims 6, 14 and 22 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Pereira in view of Blakeley and Meyerson. Applicant respectfully traverses the rejection at least because the asserted combination does not include all the limitations recited in the claims. Meyerson is relied on for disclosing dropping a database table upon system shutdown. However, it is respectfully submitted that Blakeley and Meyerson do not satisfy the deficiencies of Pereira, and those references, either alone or in combination, do not teach or suggest all the limitations of the claims. Accordingly, even assuming *arguendo* that it would have been obvious to combine the

teachings of Pereira with Blakeley and Meyerson, as asserted in the Office Action, such a combination would not satisfy all the limitations of the claims, and hence, does not render the claims unpatentable.

Claims 7, 15 and 23 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Pereira in view of Benedikt. Applicant respectfully traverses the rejection at least because the asserted combination does not include all the limitations recited in the claims. Benedikt is relied on for disclosing providing a syntax. However, it is respectfully submitted that Benedikt does not satisfy the deficiencies of Pereira, and those references, either alone or in combination, do not teach or suggest all the limitations of the claims. Accordingly, even assuming *arguendo* that it would have been obvious to combine the teachings of Pereira with Benedikt, as asserted in the Office Action, such a combination would not satisfy all the limitations of the claims, and hence, does not render the claims unpatentable.

New claims 25-30 depend from one of claims 1, 9, 17, and hence, are patentable for at least the same reasons. New claims 25 - 30 are supported at least at page 15, line 10, through page 16, line 11.

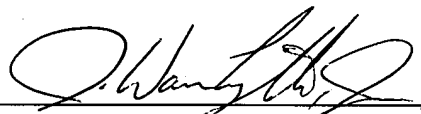
In view of the foregoing, Applicants respectfully request the Examiner to find the application in condition for allowance. However, if for any reason the Examiner believes that the application is not now in condition for allowance, the Examiner is respectfully requested to call the undersigned to resolve any issues and to expedite the disposition of the application.

Amendment

U.S. Patent Appln. No. 09/637,381

Applicant hereby petitions for any extension of time that may be required to maintain the pendency of this case, and any required fee for such extension is to be charged to Deposit Account No. 09-0460.

Respectfully submitted,



J. Warren Lytle, Jr.

Registration No. 39,283

EDELL, SHAPIRO & FINNAN, LLC
1901 Research Boulevard, Suite 400
Rockville, Maryland 20850-3164
(301) 424-3640

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